

**From:** [Warr \(Kettler\), Kristie](#)  
**To:** [Moore, Gary](#)  
**Cc:** [Crawford, Beth](#); [Cobb, Derrick](#)  
**Subject:** RE: FT1002 (TCLP Data)  
**Date:** Monday, September 15, 2014 3:16:07 PM

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Gary,

I have emailed back and forth with the lab. For this specific sample the SVOC TCLP analysis was performed at a 10X dilution, the cresol (2-methylphenol and 3&4-methylphenol) levels prevent any lower dilution run. Here is an excerpt from one of the lab emails.

“these samples were extremely contaminated with hydrocarbons and various other “non-target” compounds that made analysis of this set of samples extremely difficult. We were meticulous and deliberate in insuring that the lowest possible detection limits were reported, without the threat of compromising the data or the instrumentation. Unfortunately, analysis of these samples at a lower dilution is not an option, as this poses a serious risk to our instrumentation. Analysis of these samples with such levels of non-target compounds will also most likely compromise the data, as target compounds, surrogate compounds, and internal standards tend to become lost in the background “noise” of the contaminant peaks.”

I have started to receive the EDDs for the samples collected. We will get these EDDs processed and loaded into SCRIBE so that we can get a good overview of the data. We will create summary tables that include both the total analysis and TCLP analysis concentrations. For samples with elevated reporting limits on the TCLP analysis, we will be able to quickly look at the concentration reported in the total analysis. Hopefully, the total analysis concentrations will help us in supporting disposal criteria. We will work today and tomorrow in getting the EDDs loaded into Scribe. I spoke with Mark Balhoff, he will be able to work on a summary table on Wednesday. We will plan to have you a draft summary table by Thursday morning that includes all of these waste samples.

Let me know if you have any questions!

Kristie

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**From:** Warr (Kettler), Kristie  
**Sent:** Monday, September 15, 2014 10:57 AM  
**To:** 'Moore, Gary'  
**Cc:** Crawford, Beth; Cobb, Derrick  
**Subject:** RE: FT1002 (TCLP Data)

Gary,

I'm sorry I missed your call. I'm looking at the report you attached. I see the TCLP regulatory limits that are exceeded in FT 1002.

I took at the totals for FT1002 in SDG 54039. The total concentration for 2,4-dinitrotoluene is 13 U ug/L. Hexachlorobenzene (total) is 16 U ug/L. Hopefully, since the totals are non-detect at levels well below the regulatory levels, that will address the issue.

I also have a call into the lab to ask them about the deviation between the total and TCLP concentrations.

I will be back in touch ASAP.

Kristie

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**From:** Moore, Gary [<mailto:Moore.Gary@epa.gov>]  
**Sent:** Sunday, September 14, 2014 10:43 AM  
**To:** Warr (Kettler), Kristie  
**Cc:** Crawford, Beth  
**Subject:** CES: FT1002 (TCLP Data)

**Kristie:**

**Reviewing this data made me look at the detection limits associated with FT1002. The rules read that "equal to or exceeding". The following chemicals had issues that I could tell:**

**2,4-Dinitrotoluene**

**Hexachlorobenzene**

**It would appear that I would have to call this waste a hazardous waste only because we could not determine if the waste was equal to or exceeds the Regulatory Level.**

**What is the resolution to this?**

**I am hoping there are not others like this.**

**Gary Moore**

**Federal On-Scene Coordinator**

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